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*Attorneys for Plaintiffs Fernando Hirsch Merhej and  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |   |
|--|---|
| -----X                                 |   |
| FERNANDO HIRSCH MERHEJ and             | : |
| KARIFER MERCANTILE E AGRÍCOLA EIRELI,  | : |
|  | : |
| Plaintiffs,                            | : |
|  | : |
| - against -                            | : |
|  | : |
| I.C.S. INTERNATIONAL CUSTODY SYSTEM    | : |
| INC., ABC CORPORATIONS 1-50, ALEJANDRO | : |
| GIL and JOHN DOES 1-50,                | : |
|  | : |
| Defendants.                            | : |
| -----X                                 |   |

Plaintiffs Fernando Hirsch Merhej and Karifer Mercantile e Agrícola Eireli hereby move to withdraw their motion for a default judgment (the “Motion”) against Defendant International Custody System Inc. (the “Defaulting Defendant”), dated April 25, 2013; the declaration of Troy Selvaratnam in support of the Motion (the “Declaration”), dated April 25, 2013; and the attachments and exhibits submitted in connection with the Motion and the Declaration. Plaintiffs make this Motion in order to submit an Order to Show Cause for Default Judgment against the Defaulting Defendant in accordance with the Default Judgment Procedures before the Honorable John G. Koeltl.

Dated: New York, New York  
May 7, 2013

SELVARATNAM LAW OFFICE, PLLC

A handwritten signature in blue ink, appearing to read 'Troy Selvaratnam', is written over a horizontal line.

By: \_\_\_\_\_

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